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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

OMIRA BERIA,

Defendant.

2:16-CR-00276-APG-GWF

STIPULATION FOR
PROTECTIVE ORDER

ORDER

IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden, United States Attorney for the District of Nevada, and Kimberly M. Frayn, Assistant United States Attorney, counsel for the United States, and Richard P. Sorenson, Esq., counsel for defendant OMIRA BERIA, that this Court issue an Order protecting from disclosure to the

1 public any discovery documents containing the personal identifying information such as social
2 security numbers, drivers' license numbers, dates of birth, or addresses, of participants, witnesses
3 and victims in this case. Such documents shall be referred to hereinafter as "Protected
4 Documents." The parties state as follows:

5
6 1. Protected Documents which will be used by the government in its case in chief
7 include personal identifiers, including social security numbers, drivers' license numbers, dates of
8 birth, financial account numbers and addresses, of participants, witnesses, and victims in this case.

9
10 2. Discovery in this case is not unusually voluminous, however, given the nature of
11 the allegations, and the facts and circumstances surrounding the crimes with which the defendants
12 are charged, that is, that the defendants manufactured and used counterfeit mail keys to steal mail
13 from repository boxes and then to assumed a the identity of persons other than themselves to obtain
14 money, many of the documents in the discovery, including hundreds of pieces of recovered stolen
15 mail, necessarily include personal identifiers. Redaction of the personal identifiers prior to
16 discovery production will be unnecessarily burdensome on the government's resources and will
17 necessitate a brief delay in the timeliness of discovery disclosure.

18
19 3. Instead, the United States agrees to provide Protected Documents without redacting
20 the personal identifiers of participants, witnesses, and victims, so long as the Defendants agrees to
21 this Protective Order in an effort to reduce the risk of re-victimization.

22
23 4. Access to Protected Documents will be restricted to persons authorized by the
Court, namely defendants, attorneys of record and attorneys' paralegals, investigators, experts,
secretaries and other persons employed by the attorneys of record and performing on behalf of
defendants.

1 5. The following restrictions will be placed on defendants, defendants' attorneys and
2 the above-designated individuals unless and until further ordered by the Court. Defendants,
3 defendants' attorneys and the above-designated individuals shall not:

4 a. make copies for, or allow copies of any kind to be made by any other person of
5 Protected Documents;

6 b. allow any other person to read Protected Documents; and

7 c. use Protected Documents for any other purpose other than preparing to defend
8 against the charges in the Indictment or any further superseding indictment arising out of this case.

9 6. Defendants' attorneys shall inform any person to whom disclosure may be made
10 pursuant to this order of the existence and terms of this Court's order.

11 7. The requested restrictions shall not restrict the use or introduction as evidence of
12 discovery documents containing personal identifying information such as social security numbers,
13 drivers' license numbers, dates of birth, financial account numbers and addresses during the trial
14 of this matter.

15 8. Upon conclusion of this action, defendants' attorneys shall return to government
16 counsel or destroy and certify to government counsel the destruction of all discovery documents

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1 containing personal identifying information such as social security numbers, drivers' license
2 numbers, dates of birth, financial account numbers and addresses within a reasonable time, not to
3 exceed thirty days after the last appeal is final.

4 DANIEL G. BOGDEN
United States Attorney

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6 /s/Kimberly M. Frayn
KIMBERLY M. FRAYN
7 Assistant United States Attorney

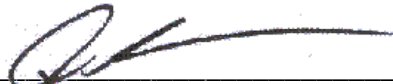
DATE October 7, 2016

8
9 /s/
10 RICHARD P. SORENSON, ESQ.
Assistant Federal Public Defender
11 Counsel for defendant BERIA

DATE October 7, 2016

12
13 **ORDER**

14 IT IS SO ORDERED this 11th day of October 2016.

15
16 
17 _____
UNITED STATES DISTRICT JUDGE